

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

**DECLARATION OF KEVIN GANNON IN SUPPORT OF
SINGULAR'S MOTION TO COMPEL 30(B)(6) TESTIMONY OF GOOGLE
AND FOR EXPEDITED BRIEFING THEREON**

I, Kevin Gannon, declare and state as follows:

1. I am an attorney admitted to practice law in this District and am counsel for the Plaintiff, Singular Computing, LLC (“Singular”).
2. I submit this declaration in support of Singular’s Motion to Compel 30(b)(6) Testimony of Google and for Expedited Briefing Thereon. I have personal knowledge of the facts set forth herein and could, if called to do so, testify to them competently and under oath.
3. Attached hereto as Exhibit A is a true and correct excerpted copy of Google’s fourth supplemental responses and objections to Singular’s First Set of Interrogatories Nos. 1-10.
4. Attached hereto as Exhibit B is a true and correct copy of Google’s responses and objections to Singular’s 30(b)(6) Notice of Deposition of Google.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on June 14, 2021 at Boston, MA.

/s/ Kevin Gannon